UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM POWDER PRODUCTS MARKETING, SALES PRACTICES, AND PRODUCTS LIABILITY LITIGATION

Civil Action No. 3:16-md-2738-MAS-RLS

MDL No. 2738

THIS DOCUMENT RELATES TO ALL CASES

MOTION AND NOTICE OF MOTION OF THE PLAINTIFFS' STEERING COMMITTEE TO EXCLUDE THE GEOLOGY OPINIONS OF DRS. MARY POULTON AND LAURA WEBB

PLEASE TAKE NOTICE, that pursuant to Fed. R. Evid. 104(a), 403, 702, and 703, the Plaintiffs' Steering Committee ("PSC") hereby moves to exclude the opinions and testimony of Mary Poulton, Ph.D. and Laura Webb, Ph.D.

For the reasons set forth more fully in the following accompanying materials, the Court should grant the PSC's motion:

- The Plaintiffs' Steering Committee's Brief Regarding the Rule 702 Standard;
- The Plaintiffs' Steering Committee's Memorandum of Law in Support of Its Motion to Exclude the Geology Opinions of Drs. Mary Poulton and Laura Webb; and
- Certification of Counsel with attached Exhibits.

A proposed form of order is attached.

Dated: July 23, 2024 Respectfully submitted,

/s/ Michelle A. Parfitt
Michelle A. Parfitt
ASHCRAFT & GEREL, LLP
1825 K Street, NW, Suite 700
Washington, DC 20006

Tel: 202-783-6400 Fax: 202-416-6392

mparfitt@ashcraftlaw.com

/s/ P. Leigh O'Dell

P. Leigh O'Dell
BEASLEY, ALLEN, CROW, METHVIN,
PORTIS & MILES, P.C.
218 Commerce Street
Montgomery, AL 36104

Tel: 334-269-2343 Fax: 334-954-7555

Leigh.odell@beasleyallen.com

Plaintiffs' Co-Lead Counsel

/s/ Christopher M. Placitella Christopher M. Placitella COHEN, PLACITELLA & ROTH, P.C. 127 Maple Avenue Red Bank, NJ 07701

Tel: 732-747-9003 Fax: 732-747-9004 cplacitella@cprlaw.com

Plaintiffs' Liaison Counsel

PLAINTIFFS' EXECUTIVE COMMITTEE:

Warren T. Burns BURNS CHAREST LLP 500 North Akard Street, Suite 2810 Dallas, TX 75201

Tel: 469-904-4551 Fax: 469-444-5002

wburns@burnscharest.com

Hunter J. Shkolnik NAPOLI SHKOLNIK PLLC 360 Lexington Avenue, 11thFloor New York, NY 10017

Tel: 212-397-1000 hunter@napolilaw.com Richard Golomb GOLOMB & HONIK, P.C. 1515 Market Street, Suite 1100 Philadelphia, PA 19102 Tel: 215-985-9177

rgolomb@golombhonik.com

PLAINTIFFS' STEERING COMMITTEE:

Laurence S. Berman LEVIN, SEDRAN & BERMAN LLP 510 Walnut Street, Suite 500 Philadelphia, PA 19106 Tel: 215-592-1500

Fax: 215-592-4663 lberman@lfsblaw.com

Sindhu S. Daniel BARON & BUDD, P.C. 3102 Oak Lawn Avenue, #1100 Dallas, TX 75219

Tel: 214-521-3605 Fax: 214-520-1181 sdaniel@baronbudd.com Timothy G. Blood BLOOD, HURST & O'REARDON, LLP 501 West Broadway, Suite 1490 San Diego, CA 92101

Tel: 619-338-1100 Fax: 619-338-1101 tblood@bholaw.com

Jeff S. Gibson WAGNER REESE, LLP 11939 N. Meridian St. Carmel, IN 46032 Tel: (317) 569-0000 Fax: (317) 569-8088

jgibson@wagnerreese.com

Kristie M. Hightower LUNDY, LUNDY, SOILEAU & SOUTH, LLP 501 Broad Street Lake Charles, LA 70601

Tel: 337-439-0707 Fax: 337-439-1029

khightower@lundylawllp.com

Victoria Maniatis SANDERS PHILLIPS GROSSMAN, LLC 100 Garden City Plaza, Suite 500 Garden City, NJ 11530

Tel: 516-640-3913 Fax: 516-741-0128

vmaniatis@thesandersfirm.com

Christopher V. Tisi LEVIN PAPANTONIO 316 South Baylen St. Pensacola, FL 32502 (850) 435-7000 ctisi@levinlaw.com. Daniel R. Lapinski MOTLEY RICE LLC 210 Lake Drive East, Suite 101 Cherry Hill, NJ 08002 Tel: 856-667-0500

Fax: 856-667-5133

dlapinski@motleyrice.com

Carmen S. Scott MOTLEY RICE LLC 28 Bridgeside Boulevard Mount Pleasant, SC 29464

Tel: 843-216-9162 Fax: 843-216-9450 cscott@motleyrice.com